

June 10, 2015

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte In the matter of *Ensuring Customer Premises Equipment Backup Power for Continuity of Communications* (PS Docket No. 14-174); *Technology Transitions* (GN Docket No. 13-5); *Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers* (RM 11358); *Special Access for Price Cap Local Exchange Carriers* (WC Docket No. 05-25); *AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services* (RM-10593)

Dear Ms. Dortch:

On Monday, June 8, 2015, Paul Plofchan, ADT Vice President for Government and Regulatory Affairs, along with Geoff Why of Mintz Levin and Rachel Sanford of ML Strategies, met with Matt DelNero, Daniel Kahn, John Visclosky, Jean Ann Collins, Bakari Middleton, Heather Hendrickson, and Michelle Berlove of the Wireline Competition Bureau. The purpose of this meeting was to discuss consumer communications and the use of Managed Facilities Voice Network (MFVN) standards during the IP transition.

ADT advocated for clear and neutral communications related to the transition itself, which explains to customers affected by the discontinuation of TDM service that the transition to IP enabled communications services has no impact on the functionality of their alarm services, as verified by proposed technology transition trials. ADT believes this communication should be void of any marketing material about telecommunications service offerings, other product marketing materials, or references. ADT is hopeful that the Commission will agree about the necessity for neutral communication about the transition itself, separate from the opportunity to market additional service offerings that are not required for the customer to successfully transition from TDM Service. ADT is sensitive to the concerns of telecommunications carriers and believes that if this proposal is adopted, it would impose little, if any, burden.

MFVN standards provide relevant providers certainty about the functionality of networks as technology transitions move forward, ensure alarm services work on IP-based networks and subsequent technologies, and eliminate the need for individual negotiations between telecommunications providers and more than 14,000 alarm services providers nationwide. As both ADT and AT&T have previously indicated, transition principles have been developed by a

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

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Marlene Dortch

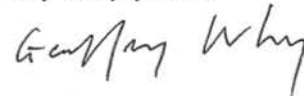
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cooperative process with one another that support these goals and verify the technological capabilities to carry them out.¹ ADT supports adopting these principles into transition rules so that all alarm industry participants – customers, alarm companies, and IP service providers – enjoy their benefit(s).

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed via ECFS, and a copy will be provided via email to the attendees.

Very truly yours,

A handwritten signature in black ink, appearing to read "Geoffrey G. Why".

Geoffrey G. Why

cc: Matthew DelNero, Chief, Wireline Competition Bureau
Daniel Kahn, Deputy Chief, Wireline Competition Bureau
Heather Hendrickson, Wireline Competition Bureau
Michelle Berlove, Wireline Competition Bureau
Jean Ann Collins, Wireline Competition Bureau
Bakari Middleton, Wireline Competition Bureau
John Visclosky, Wireline Competition Bureau

¹ See Comments of ADT Security Services, GN Docket No. 13-5 et. al., (filed February 5, 2015), and Reply Comments of AT&T Services, Inc., GN Docket No. 13-5 et. al., (filed March 9, 2015).